

Corporate Human Rights Benchmark 2022 Company Scoresheet



Company Name McDonald's

Industry Agricultural Products (Supply Chain only)

Overall Score 16.1 out of 100

Theme Score	Out of	For Theme
1.3	10	A. Governance and Policies
6.3	25	B. Embedding Respect and Human Rights Due Diligence
4.5	20	C. Remedies and Grievance Mechanisms
0.8	25	D. Performance: Company Human Rights Practices
3.2	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Universal Declaration of Human rights (UDHR): The Company states in its Human Rights Policy that it is 'is committed to respecting human rights as set out in the Universal Declaration of Human Rights'. [Human Rights Policy, N/A: corporate.mcdonalds.com] Score 2 • Not Met: Commitment to the UNGPs: The Company indicates that 'Our Human Rights Policy ("Policy") is also guided by the United Nation Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work'. However, to be 'guided by' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, N/A: corporate.mcdonalds.com] • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: The Company indicates that 'Our Human Rights Policy ("Policy") is also guided by () the International Bill of Human Rights'. However, to be 'guided by' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, N/A: corporate.mcdonalds.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Company has a commitment to the ILO Core: The Company indicates that 'Our Human Rights Policy ("Policy") is also guided by [] the International Labour Organization's Declaration'. The Company also states that it 'strives to respect the fundamental rights of McDonald's employees, which are: freedom from slavery and child labor; freedom to associate (or not associate) and collectively

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		bargain; equal opportunity for everyone; a safe and healthy workplace; and freedom from discrimination and harassment'. However, 'strive to respect' is not considered a formal commitment according to CHRB wording criteria. In addition, in its (new) Standards of Business Conduct, it indicates: 'At McDonald's, We will not employ underage children or forced laborers. We prohibit physical punishment or abuse. We respect the right of employees to associate or not to associate with any group, as permitted by and in accordance with applicable laws and regulations. McDonald's complies with employment laws in every market where we operate.' However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'as permitted by' applicable laws. [Human Rights Policy, N/A: corporate.mcdonalds.com] & [Standards of Business Conduct, 12/2019: corporate.mcdonalds.com] & [Standards of Business Conduct indicates: 'At McDonald's we conduct our activities in a manner that respects human rights as set out in The United Nations Universal Declaration of Human Rights. [] We support fundamental human rights for all people. We will not employ underage children or forced laborers. We prohibit physical punishment or abuse. We respect the right of employees to associate or not to associate with any gr
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	corporate.mcdonalds.com] The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to respect H&S of workers: The Company indicates that 'We are committed to providing a safe and healthful working environment for our employees. We require all employees to abide by safety rules and practices and to take the necessary precautions to protect themselves and their fellow employees. For everyone's safety, employees must immediately report accidents and unsafe practices or conditions to their immediate supervisors'. [Standards of Business Conduct UK, 12/2019: corporate.mcdonalds.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week Score 2 • Met: Expect suppliers to commit to H&S of their workers: The supplier code indicates that 'suppliers shall have systems to prevent, detect and respond to potential risks to the safety, health and security of all employees'. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates that 'Employees shall be allowed at

Indicator Code	Indicator name	Score (out of 2)	Explanation
			least one day off every seven days, and any overtime worked shall be voluntary. If local law allows, employees may voluntarily work overtime on rest days, provided that they are allowed at least one day off within the next seven days. Continuous working days are never to exceed 21 days without a rest day'. However, no expectation of formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Respect land ownership and natural resources as set out in VGGT Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration: It indicates that 'Where McDonald's may impact the human rights of particularly vulnerable groups, such () indigenous peoples, () we are also guided by other international standards that elaborate on their rights: However, no commitment to respect the rights of indigenous peoples found. [Human Rights Policy, N/A: corporate.mcdonalds.com] Not Met: Expecting suppliers to make these commitments Score 2 Not Met: Respecting the right to water Not Met: Company's policy commits to obtain FPIC: It indicates, on its Commitment on Forests, that 'We expect our suppliers to operate their businesses ethically and abide by all applicable laws and regulations. Additionally, we will work throughout our supply chains to achieve the following: () Respect the right of all affected communities to give or withhold their free, prior and informed consent for plantation developments on land they own legally, communally or by custom; Resolve land rights disputes through a balanced and transparent dispute resolution process'. However, it is not clear the Company expects suppliers to respecting land ownership and natural resources as set out in the IFC Performance Standards or VGGT found. Neither is it clear that the Company expects suppliers to commit to respecting indigenous peoples' rights'. [Commitment on Forests, 14/02/2017: corporate.mcdonalds.com] Not Met: Expecting suppliers to make these commitments : It indicates, on its Commitment on Forests, that 'We expect our suppliers to operate their businesses ethically and abide by all applicable laws and regulations. Additionally, we will work throughout our supply chains to achieve the following: () Respect the right of all affecte
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0.5	is not clear suppliers are expected to respect the right to water. [Commitment on Forests, 14/02/2017: corporate.mcdonalds.com] The individual elements of the assessment are met or not as follows: Score 1 • Met: Women's rights: The Company indicates that it is 'pleased to share that McDonald's has signed on to the UN Women's Empowerment Principles'. [Celebrating and Advancing Women at McDonald's on web, N/A: corporate.mcdonalds.com] • Not Met: Expects suppliers to respect at least one of these rights [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] Score 2 • Met: CEDAW/Women's Empowerment Principles: The Company indicates that it is 'pleased to share that McDonald's has signed on to the UN Women's
A.1.4	Commitment to remedy	0	Empowerment Principles'. [Celebrating and Advancing Women at McDonald's on web, N/A: corporate.mcdonalds.com] Not Met: Expecting suppliers to respect these rights The individual elements of the assessment are met or not as follows: Score 1 Not Met: The Company commits to remedy: The Company indicates that 'We commit to reduce the risk of infringing on human rights by identifying, monitoring, and addressing any impacts on human rights to our employees, which we have caused or to which we have contributed. We provide access to remediation and encourage our business partners to do the same'. However, it is not clear if this commitment to remedy is also extensive to impacts on individuals and communities [Human Rights Policy, N/A: corporate.mcdonalds.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 Not Met: Company expect suppliers to make this commitment Score 2 Not Met: Collaborating with other remedy initiatives Not Met: Work with suppliers to remedy impact [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com]
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Zero tolerance attacks on HRs Defenders (HRDs): On its Standards of Business Conduct, the Company indicates that 'McDonald's strictly prohibits retaliation of any kind directed against an employee who reports an issue concerning compliance with the Standards'. However, no publicly available policy statement found committing it to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders in general. The previous assessment was partially based on the website section 'Human Rights', which CHRB no longer considers a suitable source for policy statements. [Standards of Business Conduct UK, 12/2019: corporate.mcdonalds.com] & [Respecting human rights on website, N/A: corporate.mcdonalds.com] Not Met: Company expect suppliers to make this commitment Score 2

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board level responsibility for HRs: The Company's Human Rights Policy indicates: 'Board level oversight on matters related to human capital management, including human rights, is provided by the Public Policy and Strategy Committee of McDonald's Board of Directors'. [Human Rights Policy, N/A: corporate.mcdonalds.com] • Not Met: Describe HR expertise of Board member Score 2 • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board/Committee review HRs strategy: The Public Policy and Strategy Committee of McDonald's Board of Directors which has 'oversight on matters related to human capital management, including human rights', discloses it procedures. However, it is not clear the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes. Previous assessment was partially based on the "Report of the sustainability and corporate responsibility committee of the board", dated 2014, which is now out of the three-year timeframe that the methodology requires. [Public Policy and Strategy Committee Charter, 07/2021: corporate.mcdonalds.com] • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Incentives for at least one board member Not Met: At least one key HR risk, beyond employee H&S Score 2 Not Met: Performance criteria made public Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Board process to review bussiness model and strategy Not Met: Describe frequency and triggers for reviewing Score 2 Not Met: Meets both requirements under score 1 Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total) B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Score of 1 on A.1.2.a: See indicator A.1.2. Met: Senior responsibility for HR implementation and decision making: The website section Human Rights and Respectful Workplaces indicates: 'McDonald's Chief Global Impact Officer, in partnership with the Chief People Officer, is ultimately responsible for our corporate human rights efforts'. [Human Rights and Respectful Workplaces (web), N/A: corporate.mcdonalds.com] Score 2 Met: How it assigns Day-to-day responsibility: The Human Rights Policy indicates: 'Human Resources manages this Policy and works with various departments across the company, including Global Supply Chain & Sustainability, and Corporate Affairs, on its day-to-day implementation'. [Human Rights Policy, N/A: corporate.mcdonalds.com] Not Met: Day-to-day resources and expertise allocation in own ops Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Senior manager incentives for human rights Not Met: At least one key HR risk, beyond employee H&S Score 2 Not Met: Performance criteria made public Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR risks is integrated as part of enterprise risk system: The Company summarizes its Risk Factors in its Annual Report 2019, including the following: 'These regulations [regulations affecting our workforce] are increasingly focused on employment issues, including wage and hour, healthcare, immigration, retirement and other employee benefits and workplace practices. Claims of non-compliance with these regulations could result in liability and expense to us. Our potential exposure to reputational and other harm regarding our workplace practices or conditions or those of our independent franchisees or suppliers, including those giving rise to claims of sexual harassment or discrimination (or perceptions thereof) could have a negative impact on consumer perceptions of us and our business'. [Annual Report 2019, 26/02/2020: corporate.mcdonalds.com] • Not Met: Provides an example Score 2
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Score of 1 on A.1.2.a: See indicator A.1.2 Met: Communicates its policy to all workers in own operations: It indicates: 'To help employees understand their rights and their duty to respect the rights of others, the Company offers training to all employees on the Policy [Human Rights Policy]. Both our Policy and training are available in 15 languages'. [Human Rights and Respectful Workplaces (web), N/A: corporate.mcdonalds.com] Score 2 Not Met: Communication of policy commitments to stakeholder Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2 Met: Requires suppliers to communicate policy requirements: The Company indicates: 'In order to provide goods and services to the McDonald's System, suppliers must meet our high standards, and direct suppliers are required to commit to upholding the standards contained in our Code. We expect, and provide guidance to assist, our suppliers to meet the standards for human rights, workplace environment, business integrity and environmental management contained in the Code'. The Supplier Code of Conduct indicates: 'We expect suppliers to hold their supply chain, including subcontractors and third party labor agencies, to the same standards contained in this Code'. [McDonald's Supplier Code of Conduct, 2012:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			corporate.mcdonalds.com] & [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] Score 2 • Not Met: How HR commitments made binding/contractual: As indicated above, 'direct suppliers are required to commit to upholding the standards contained in our Code. We expect, and provide guidance to assist, our suppliers to meet the standards for human rights, workplace environment, business integrity and environmental management contained in the Code'. However, no further description found of how its human rights policy commitments are reflected within contractual or other binding arrangements with its suppliers. Previous assessment was based on evidence found the website section Respecting human rights and it is no longer publicly available. [Respecting human rights on website, N/A: corporate.mcdonalds.com] & [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] • Not Met: Company requires suppliers to cascade down to their suppliers: As indicated above, the Company states that 'We expect suppliers to hold their supply chain, including subcontractors and third party labor agencies, to the same standards contained in this Code', however, no further details found in relation to whether binding arrangements are cascaded down. [McDonald's Supplier Code of
B.1.5	Training on		Conduct, 2012: corporate.mcdonalds.com] The individual elements of the assessment are met or not as follows:
	Human Rights	0.5	 Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2. Net: How workers are trained on HR policy commitments: It indicates: 'To help employees understand human rights, we made training for staff on the Human Rights Policy available in 2019. Available in 15 languages, the training has a section on forced labour that identifies particularly vulnerable groups and outlines McDonald's commitments surrounding ethical recruitment. McDonald's UK employees are also trained regularly on the Standards of Business Conduct and are required to annually certify their understanding of and commitment to upholding the Standards'. [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] Met: Trains relevant managers including procurement: It also indicates: 'Given their important role in working with suppliers, McDonald's UK supply chain procurement employees undergo in-person and webinar trainings on supporting suppliers in meeting their expectations under the Supplier Code of Conduct and SWA programme. In 2020, McDonald's developed two new online training modules for procurement employees to enhance their understanding of human rights issues in global supply chains'. [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] Score 2 Not Met: Score of 2 on A.1.2.a: See indicator A.1.2 Met: Trains suppliers to meet company's HR commitment: Additionally: 'For suppliers, the global SWA programme includes an online training platform where they can access materials that provide guidance on preventing modern slavery. Training modules include: Ensuring Eligibility to Work, Protecting the Rights of Migrant Labour, and Implementing Grievance Mechanisms. For example, the Migrant Labour training aims to educate suppliers on the risks related to modern slavery when sourcing migrant labour and some key actions they can take to ensure they are protecting the rights of migrant workers in their facilities. McDonald's also offers optional live training sessions for suppliers with exter
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2 Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Human Rights Policy notes: 'We commit to reduce the risk of infringing on human rights by identifying, monitoring, and addressing any impacts on human rights to our employees, which we have caused or to which we have contributed'. The webpage Supply Chain Human Rights indicates its process for verifying compliance: 'Human rights due diligence is incorporated into the SWA [Supplier Workplace Accountability] program through on-site announced and unannounced audits conducted by third-party auditing firms that assess

Indicator Code	Indicator name	Score (out of 2)	Explanation
			compliance with our Code'. More specifically: 'Step 1: Online training to help suppliers understand what is expected of them. Step 2: Suppliers complete a rigorous annual self-assessment questionnaire to appraise their current systems and practices. This results in a report indicating areas for improvement. Step 3: Third-party firms conduct announced and unannounced audits. Step 4: The auditing firm shares any noncompliance with the supplier, who is then required to produce an action plan to address the noncompliance'. However, no further description found on how it monitors the implementation of its human rights policy commitments across its own operations. [Human Rights Policy, N/A: corporate.mcdonalds.com] & [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] & [Supply Chain monitored: It indicates: 'The Supplier Code of Conduct is the cornerstone of the global Supplier Workplace Accountability ("SWA") programme, which aims to help suppliers understand McDonald's expectations, verify compliance with our expectations and work toward continuous improvement. At the end of 2020, we had over 4,000 facilities participating in the SWA programme across 98 countries, with 96 active facilities managed by McDonald's UK'. However, it is not clear the proportion it represents of suppliers monitored. [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] Not Met: Describe how workers are involved in monitoring Score 2 Not Met: Score of 2 on A.1.2.a: See indicator A.1.2 Met: Describes corrective action process: It indicates: 'Where non-compliance is identified through an on-site audit, suppliers work with a third-party audit firm to complete a corrective and preventative action plan to address the non-compliance. The plan must provide specific time frames within which corrective action will be taken, root causes analysed, and policies and procedures updated. In addition, the plan must be designed to avoid recurrence of the non-compliance, suppliers are subject to a follow-up audit to ensure that the non-
B.1.7	Engaging and terminating business relationships	2	• Not Met: Disclose findings and number of corrective action The individual elements of the assessment are met or not as follows: Score 1 • Met: HR affects selection of suppliers: It indicates: 'As part of the onboarding process to become a McDonald's supplier, suppliers must complete the required steps of the SWA [Supplier Workplace Accountability] program (outlined below) to verify that they can meet our expectations'. The SWA program 'supports compliance with the standards and expectations outlined in our Code'. [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] & [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] • Met: HR affects on-going supplier relationships: Also: 'McDonald's SWA program is designed to support suppliers in meeting our standards. However, there are circumstances under which McDonald's will remove a supplier from the supply chain to address instances of significant noncompliance with the Code'. As it is mentioned above, the SWA program 'supports compliance with the standards and expectations outlined in our Code'. [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] Score 2 • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: It indicates, in its webpage Responsible Sourcing: 'We also source from suppliers that are approved by the McCafé Sustainability Improvement Platform (McCafé SIP) program, established by McDonald's in partnership with Conservation International and our coffee roasters. The McCafé SIP framework is our long-term investment for a more sustainable future. It's how we engage and guide our coffee supply chain in sustainable sourcing, as well as invest in coffee growers and their communities over the long term. Through the framework, McDonald's roasters leverage their expertise to innovate and advance sustainable farming practices in partnership with farmers. McCafé SIP is currently active in five countries across South and Central America, reaching ne

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The webpage Governance & Stakeholder Engagement states that its stakeholders, including: NGOs, Franchisees, Suppliers & Producers, Crew & Corporate Staff and Communities. Moreover, the webpage Supply Chain Human Rights notes: 'On-site audits are physical inspections of the facility and include visits to worker housing and cafeterias. The auditing firms also conduct private worker interviews and review facility records and business practices'. However, it is not clear how the Company has identified, and engaged with affected stakeholders, in the last two years. [Governance & Stakeholder Engagement (web), N/A: corporate.mcdonalds.com] & [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] Not Met: Discloses stakeholders that HRs may be affected Not Met: Provides two examples of engagement with stakeholders Score 2 Not Met: Analysis of stakeholder views on company's HR issues Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Identifying risks in own operations: It indicates: 'We take seriously our responsibility to act with due diligence to avoid infringing on the rights of others and to address any human rights impacts should they occur'. However, it is not clear the process it uses to identify its human rights risks and impacts in specific locations or activities, covering its own operations. [Human Rights and Respectful Workplaces (web), N/A: corporate.mcdonalds.com] Net: Identifying risks through relevant business relationships: It indicates: 'An important element of our human rights due diligence approach is understanding global and national human rights risks and using this information to evolve the SWA program. We assess the potential human rights risks of our supply chains through desk-based research, supply chain mapping and on-site audits, and relevant stakeholder engagement. A key indicator of risk we use is the country of origin from which we are sourcing products or raw materials. For example, we use analysis of country-level human rights risks to help inform the audit cycles for our suppliers. Facilities situated in countries that are considered to be at high risk require more regular on-site audits, regardless of the outcome of previous audits. () In 2018, McDonald's engaged an external provider to conduct a Human Rights Impact Assessment (HRIA) at the farm level. The assessment enabled us to identify that, of all of the commodities we source, palm oil, tea, coffee and timber present the greatest risk of exposure to human rights concerns, with occupational health and safety, migrant workers and decent working time identified as the highest risk areas'. [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] Score 2 Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: It indicates: 'We assess the potential human rights risks of our supply chains through [] relevant stakeh
B.2.2	Assessing human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: No description found of its process for assessing its human rights risks within its own operations. This description should include how relevant factors are taken into account, such as geographical, economic, social and other factors and a disclosure of what it considers to be its salient human rights issues should be provided. [Respecting human rights on website, N/A: corporate.mcdonalds.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: How process applies to supply chain: It indicates: 'in 2018 McDonald's engaged an external provider to conduct a human rights impact assessment ("HRIA") at the farm-level. The assessment enabled us to identify that, of the commodities we source, palm oil, tea, coffee and timber present the greatest risk of exposure to human rights concerns, with occupational health and safety, migrant workers, and decent working time identified as the highest risk areas. In addition to the farm-level commodity assessment, the HRIA also included a stakeholder consultation with key non-governmental organisations to understand how industry experts view the human rights risks associated with the production of the various commodities'. [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] Not Met: Public disclosure of the results of HR assessment: It indicates that: 'occupational health and safety, migrant workers and decent working time identified as the highest risk areas'. However, no further details of the results of its assessments found (i.e. which are the salient issues). Current evidence explicitly refers only to highest risk areas. [Respecting human rights on website, N/A: corporate.mcdonalds.com] Score 2 Not Met: Meets all requirements under score 1
B.2.3	Integrating and acting on human rights risks and impact assessments	1	• Not Met: How it involved affected stakeholders in the assessment The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain: In the context of conducting human rights impact assessment along the supply chain, it indicates: 'The HRIA findings, and the corresponding recommendations, help us strengthen human rights management frameworks to better identify, assess, prevent, mitigate or remediate salient human rights issues. For example, as we update our sustainable sourcing policies for specific commodities, we consider these recommendations in informing our human rights due diligence requirements for suppliers. We also use the HRIA findings to raise awareness of human rights risks among our supply chain staff who procure product for the McDonald's System and have taken steps to strengthen risk management procedures and improvement plans'. However, no further description found of its global system to prevent, mitigate or remediate its salient human rights issues applied to its supply chain. [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] • Met: Example of actions decided on at least 1 salient HR issues: It indicates: 'in 2017 McDonald's teamed up with other AIM-PROGRESS brands to provide optional training to suppliers on the importance of responsible sourcing. Through this coalition, suppliers around the world received training on critical human rights issues, including: () Training on forced and child labor, wages and working hours, and health and safety for suppliers in Brazil in 2019'. [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: System for tracking or monitor if actions taken are effective Not Met: Lessons learnt from checking system effectiveness Score 2 Not Met: Meets both requirements under score 1 Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Provides two examples of comms with stakeholders Score 2 Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	ı	Explanation
C.1	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: It indicates: 'Company employees can raise concerns via an anonymous global channel, the Business Integrity Line – staffed by a live operator from an independent company – 24 hours a day, 365 days a year'. [Human Rights and Respectful Workplaces (web), N/A: corporate.mcdonalds.com] Score 2 • Not Met: Channel is available in all appropriate languages and workers aware: The Business Integrity Line is available ne 38 languages. However, it is not clear how it ensures that workers are aware of it. No further evidence found. [EthicsPoint (web), N/A: secure.ethicspoint.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Supplier Code of Conduct indicates that 'suppliers shall create internal programs for handling reports of workplace grievances, including anonymous reports'. In addition, the 2020 Modern Slavery Statement states: 'McDonald's Business Integrity Line and an email address are open to third parties, including suppliers and their employees, to raise concerns with breaches of the Code'. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] & [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] • Met: Expect Suppliers to convey expectation to their own suppliers: As it is stated above, the Supplier Code of Conduct indicates that 'suppliers shall create internal programs for handling reports of workplace grievances, including anonymous reports'. Moreover, the same Code indicates: 'We expect suppliers to hold their supply chain, including subcontractors and third party labor agencies, to the same standards contained in this Code'. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com]
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Company indicates that 'McDonald's Business Integrity Line and an email address are open to third parties, including suppliers and their employees, to raise concerns with breaches of the Code'. [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] Score 2 • Not Met: Describes accessibility and local languages and stakeholder awareness: The channel is available in 38 languages, however, it is not clear how it ensures that all affected external stakeholders at its own operations are aware of it. [EthicsPoint (web), N/A: secure.ethicspoint.com] • Not Met: Communities access mechanism direct or through suppliers: The Supplier Code of Conduct indicates: 'Suppliers shall create internal programs for handling reports of workplace grievances, including anonymous reports'. However, no evidence found on whether these channels should be open to suppliers' external stakeholders and communities. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] • Not Met: Expect supplier to convey expectation to their own suppliers: As above.
C.3	Users are involved in the design and performance of the channel(s)/mec hanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Engages users to create or assess system Not Met: Examples (at least two) of how they do this Score 2 Not Met: Engages with potential or actual users on the improvement of the mechanism Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/c hannel(s) are equitable, publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Response timescales and how complainants will be informed: The company says: "When you submit the report, you will be issued a Report Key. Please write it down and keep it in a safe place. We ask you to use this Report Key along with the password of your choosing to return to EthicsPoint through the website or telephone hotline in 2-3 business days. By returning in 2-3 business days, you will have the opportunity to review any Follow-up Questions or submit more information about this incident." [EthicsPoint (web), N/A: secure.ethicspoint.com] • Not Met: Describe support (technical, financial,etc) available for equal access by complainants Score 2 • Not Met: Describe types of outcome to complainant through use of mechanism

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public statement prohibiting retaliation: The Company indicates that 'We will not tolerate any retaliation of any kind directed against anyone who reports an issue concerning compliance with this Policy'. [Human Rights Policy, N/A: corporate.mcdonalds.com] • Met: Practical measures to prevent retaliation: The Company indicates that: 'The Business Integrity Line is staffed by operators from an outside company 24 hours a day, seven days a week, 365 days a year. Calls are free, confidential and may be made anonymously.' [Standards of Business Conduct, 12/2019: corporate.mcdonalds.com] Score 2 • Met: Company indicate it will not retaliate against workers/stakeholders: The company prohibits retaliation against employees through its Global Statement of Principles Against Discrimination, Harassment and Retaliation. However, this document does not cover other stakeholders. Additionally, the company states: "In addition, the Standards and other Company policies explicitly address issues of respect and dignity, inclusion and diversity, protection against retaliation and workplace safety, among other things." In its Human Rights Policy the Company expressly states "We will not tolerate any retaliation of any kind directed against anyone who reports an issue concerning compliance with this Policy" [Human Rights Policy, N/A: corporate.mcdonalds.com] & [Global HD&R Statement of Principles, N/A: corporate.mcdonalds.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Supplier Code of Conduct indicates that 'Suppliers are responsible for prompt reporting of actual or suspected violations of law, this Code, the Standards of Business Conduct for McDonald's employees, or the McDonald's Supplier Guidance Document. This includes violations by any employee or agent acting on behalf of either the supplier on McDonald's. Such programs shall protect worker whistleblower confidentiality and prohibit retaliation'
C.6	Company involvement with state- based judicial and non- judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Complainants not asked to waive rights: The Company indicates: 'We will not impede state-based grievance processes via our employee system; we do not require employees to waive their right to use such external mechanisms to participate in our hotline'. However, it is not clear it also includes affected individuals or communities, as the Company only seems to mention its employees. [Human Rights Policy, N/A: corporate.mcdonalds.com] Not Met: Company does not require confidentiality provisions Score 2 Not Met: Will work with state based non judicial mechanisms: The Company describes, in the Standards of Business Conduct, how employees must behave if there is an internal investigation. The company states 'In the course of an investigation, you may be asked not to discuss anything about the investigation with any person, either inside or outside of McDonald's (with the exception of a whistleblower report to a governmental authority), without the express consent of those authorized to conduct the investigation. Employees are required to cooperate fully with the authorized investigation team throughout the course of the investigation and to disclose any and all relevant information in a complete and truthful manner. Employees who interfere with or provide false information in the course of an investigation will be subject to disciplinary action, up to and including termination of employment.' However, there is no evidence or description of a process by which the Company will cooperate with state-based non-judicial grievance mechanism. [Standards of Business Conduct, 12/2019: corporate.mcdonalds.com]
6.7	Dome a shirter		Not Met: Example of issue resolved (if applicable) The individual elements of the assessment are met or not as follows: The individual elements of the assessment are met or not as follows: The individual elements of the assessment are met or not as follows:
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes how remedy has been provided Not Met: Says how it would provide remedy for victims if no adverse impact identified: The Human Rights Policy indicates: 'We provide access to remediation and encourage our business partners to do the same. (). Employees may raise human rights issues, or report potential or actual human rights violations through a number of reporting channels, including contacting Human Resources, or the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Global Compliance Office. Reports received by the Global Compliance Office of alleged violations of the Standards of Business Conduct or other McDonald's policies by McDonald's employees are reviewed and addressed as appropriate. Alleged violations of this Policy can also be reported by contacting McDonald's Business Integrity Line'. However, no further description of its approach to provide or enable timely remedy for victims found. [Human Rights Policy, N/A: corporate.mcdonalds.com] Score 2 Not Met: Changes to systems, processes and practices to stop similar impact Not Met: Describe approach to monitoring implementation of agreed remedy Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Number grievances filed, addressed or resolved and outcome achieved Not Met: How lessons from mechanism improve management system Score 2 Not Met: Evaluation of the channel/mechanism and changes made as result Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: McDonald's Supplier Code of Conduct indicates that 'Suppliers shall ensure that their workers are paid lawful wages, including overtime, premium pay, and equal pay for equal work without discrimination. There shall be no disciplinary deductions from pay'. However, no evidence has been found of inclusion of living wage guidelines in its contractual arrangements with its suppliers. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] Not Met: Improving living wage practices of suppliers: The Company indicates: 'in 2017 McDonald's teamed up with other AIM-PROGRESS brands to provide optional training to suppliers on the importance of responsible sourcing. Through this coalition, suppliers around the world received training on critical human rights issues, including: () Training on forced and child labor, wages and working hours, and health and safety for suppliers in Brazil in 2019'. However, it is not clear the training supports the payment of a living wage by its suppliers. No further specifications found. [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] Score 2 Not Met: Assessment of number affected by payment below living wage Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Avoids business model pressure on HRs (purchasing practices): No evidence found of practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. Not Met: Practices adopted to pay suppliers in line with agreed timeframes Not Met: Review own operations to mitigate negative impact Score 2 Not Met: Meets all requirements under score 1 Not Met: Examples of how it assessed, addressed and change purchasing practices
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): On its webpage Responsible Sourcing, the Company indicates: 'We are committed to increasing traceability for palm oil used in the McDonald's System'. Also, 'most of the fisheries from which we source are MSC certified. McDonald's displays the MSC certification logo for our Filet-o-Fish in the U.S., Canada, Brazil and many of our European markets, where fisheries and restaurants are certified against the MSC Chain of Custody traceability standard'. However, no further evidence found that it identifies all its suppliers, including direct and indirect suppliers. [Responsible Sourcing (web), N/A: corporate.mcdonalds.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Child Labour rules in codes or contracts: The Supplier Code indicates that 'Suppliers shall ensure that no underage labor has been used in the production or distribution of their goods or services. []. Suppliers shall not employ anyone younger than 14, regardless of the country's minimum working age'. It indicates, on its website, that 'As well as maintaining legally accepted age verification records, suppliers are also expected to invest in remediation systems in the event an underage person is hired, to assist in their return to their school or support any other solution that serves the child's best interest'. However, although the Company indicates it expects age verification and remediation programmes, these requirements do not seem to be reflected on its Supplier Code of Conduct or in other contractual arrangement, as the methodology requires. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] & [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] Not Met: How working with suppliers on child labour: It indicates: 'McDonald's teamed up with other AIM-PROGRESS brands to train suppliers on the importance of responsible sourcing. Through this coalition, suppliers around the world received training on critical human rights issues, including: Training on forced and child labour, wages and working hours, health and safety for suppliers in Brazil in 2019'. However, no further description found of the actual work carried out in relation to this issue. [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] Score 2 Not Met: Assessement of number affected by child labour in supply chain Not Met: Analysis of trends in progress made
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Debt and fees rules in codes or contracts: McDonald's Supplier Code of Conduct indicates that 'Suppliers shall not use any form of slave, forced, bonded, indentured, or involuntary prison labor. They shall not engage in human trafficking or exploitation, or import goods tainted by slavery or human trafficking'. Also, according its website, the on-site audits include: 'review of ethical recruitment practices to verify that workers are employed under voluntary conditions and have freedom of movement. This includes verification that: Workers are not charged illegal fees as a condition of employment'. However, although the Company indicates recruitment fees verification, this requirement does not seem to be reflected on its Supplier Code of Conduct or in other contractual arrangement. Evidence focus in audits. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] & [Supply Chain Human Rights (web), N/A: corporate.mcdonalds.com] Not Met: How working with suppliers on debt & fees: It indicates: 'McDonald's teamed up with other AIM-PROGRESS brands to train suppliers on the importance of responsible sourcing. Through this coalition, suppliers around the world received training on critical human rights issues, including: Training on forced and child labour, () for suppliers in Brazil in 2019 sessions on () forced labour, () for Chinese suppliers in 2018. Training suppliers in Malaysia on forced labour, () and managing migrant labour in 2017'. However, it is not clear whether debt and fees rules are included in these training programs. No further description found. [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] Score 2 Not Met: Assessment of the number affected by payment of recruitment fees Not Met: Analysis of trends in progress made
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Suppliers to pay workers in full and on time in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers shall ensure that their workers are paid lawful wages, including overtime, premium pay, and equal pay for equal work without discrimination. There shall be no disciplinary deductions from pay'. However, no further evidence found that it requires the suppliers to pay workers on time in its contractual arrangements with suppliers or supplier code of conduct. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: How working with supply chain to pay workers regularly and on time: It indicates: 'McDonald's teamed up with other AIM-PROGRESS brands to train suppliers on the importance of responsible sourcing. Through this coalition, suppliers around the world received training on critical human rights issues, including: Training on forced and child labour, wages () for suppliers in Brazil in 2019. Sessions on () forced labour, working hours () for Chinese suppliers in 2018. Training suppliers in Malaysia on forced labour () in 2017'. However, it is not clear how it works with suppliers specifically to pay workers regularly, in full and on time. Score 2 Not Met: Assessment of the number affected by failure to pay directly
D 4 5 5	Doobibition of		Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met as follows:
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Free movement rules in codes or contracts: McDonald's Supplier Code of Conduct indicates that 'Suppliers shall not use any form of slave, forced, bonded, indentured, or involuntary prison labor. They shall not engage in human trafficking or exploitation, or import goods tainted by slavery or human trafficking. They shall not retain employees' government-issued identification, passports or work permits as a condition of employment'. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] • Not Met: How working with suppliers on free movement: It indicates that for suppliers 'the global SWA programme includes an online training platform where they can access materials that provide guidance on preventing modern slavery. Training modules include: Ensuring Eligibility to Work, Protecting the Rights of Migrant Labour (). For example, the Migrant Labour training aims to educate suppliers on the risks related to modern slavery when sourcing migrant labour and some key actions they can take to ensure they are protecting the rights of migrant workers in their facilities. () McDonald's teamed up with other AIM-PROGRESS brands to train suppliers on the importance of responsible sourcing. Through this coalition, suppliers around the world received training on critical human rights issues, including: Training on forced and child labour () for suppliers in Brazil in 2019. Sessions on () forced labour, () for Chinese suppliers in 2018. Training suppliers in Malaysia on forced labour, () and managing migrant labour in 2017'. However, it is not clear these different projects carried out cover the elimination of workers' document retention or other actions to physically restrict movement. [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] Score 2
D.1.6.b	Freedom of		movement • Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows:
	association and collective bargaining (in the supply chain)	0	Score 1 Not Met: FoA & CB rules in codes or contracts: McDonald's Supplier Code of Conduct indicates that 'Suppliers shall respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable laws and regulations'. However, no evidence has been found of Collective bargaining guidelines. The requirements should include guidelines prohibiting intimidation or retaliation against union members or representatives. Moreover, the requirement seem to be limited to the scope of applicable laws and regulations. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] Not Met: How working with suppliers on FoA and CB Score 2 Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Sets out clear Health and Safety requirements: McDonald's Supplier Code of Conduct indicates that 'Suppliers shall ensure that all workers receive communication and training on emergency planning and safe work practices. In addition, suppliers shall have systems to prevent, detect and respond to potential risks to the safety, health and security of all employees'. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • Not Met: Fatalities rate for lasting reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.8.b	Land rights: Land acquisition (in the supply chain)	Score (out of 2)	 Not Met: Occupation disease rate for last reporting period Score 2 Not Met: How working with suppliers on H&S: It indicates: 'in 2017 McDonald's teamed up with other AIM-PROGRESS brands to provide optional training to suppliers on the importance of responsible sourcing. Through this coalition, suppliers around the world received training on critical human rights issues, including: () Sessions on health and safety, () for Chinese suppliers in 2018. Training on () and health and safety for suppliers in Brazil in 2019'. However, no further description of theses trainings found. [2020 Modern Slavery Statement, 23/02/2022: mcdonalds.com] Not Met: Assessment of the number affected by H&S issues in the SP Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows: Score 1 Not Met: Rules on land & owners in codes or contracts Not Met: How working with suppliers on land issues: It indicates: 'By working in partnership with suppliers throughout our supply chain, we want to achieve the following: () Respect the right of all affected communities to give or withhold their free, prior and informed consent for plantation developments on land they own legally, communally or by custom. Resolve disputes over land rights through a balanced and transparent dispute resolution process'. However, no further details found of how it works with suppliers to improve their practices in relation to land
			use or acquisition. [Conserving Forests (web), N/A: corporate.mcdonalds.com] Score 2 • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Rules on water stewardship in codes or contracts: McDonald's Supplier Code of Conduct indicates that 'Suppliers are responsible for managing, measuring and minimizing the environmental impact of their facilities. Specific focus areas include air emissions, waste reduction, recovery and management, water use and disposal'. However no evidence has been found of clear guidelines that include refraining from negatively affecting access to safe water. [McDonald's Supplier Code of Conduct, 2012: corporate.mcdonalds.com] • Not Met: How working with suppliers on water stewardship issues: It indicates: 'We worked closely with suppliers to manage key resources throughout the supply chain. () We encourage and support our suppliers to assess their own management of water in their operations and supply chains. The U.S. 2020 Supplier Facility Goals included that each facility should have an Environmental Management System in place that meets expectations of an internationally recognized standard. Facilities were able to choose between one of three aspirational goals to achieve, one of which was to reduce their water intensity by 20%'. However, no further description found of how it works actively with suppliers to improve their practices in relation to access to water and sanitation. [Water Stewardship (web), N/A: corporate.mcdonalds.com] Score 2 • Not Met: Assessment on the number affected by lack of access to water and sanitation. • Not Met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Women's rights in codes or contracts: No evidence found in its contractual arrangements with suppliers or supplier code of conduct, that the Company requires suppliers to provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. • Not Met: How working with suppliers on women's rights Score 2 • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code | Indicator name | Score (out of 2) | Explanation

• Story: McDonald's employees from multiple locations across the US have filed federal complaints against the fast food giant with the Employment Opportunity Commission (EEOC), alleging incidents of sexual harassment and retaliation against complaining employees. This represents alleged repeated degrading discriminatory treatment. In May 2018, another 10 complaints were filed. In May 2019, another 25 lawsuits and regulatory charges were filed. The allegations include groping, indecent exposure, propositions for sex and lewd comments or behaviour that took place in corporate and franchise stores in numerous locations. The cases are supported by the American Civil Liberties Union (ACLU), the labour group Fight for \$15, and the Time's Up Legal Defence Fund. On November 22, 2019, the U.S. Equal Employment Opportunity Commission (EEOC) announced that it has reached a USD 340,000 settlement with a McDonald's franchisee, Credle Enterprises, in Texas to resolve a sexual harassment lawsuit filed by the Commission.
On April 16th, 2020, press sources reported that two McDonald's employees in Florida, on behalf of 5,000 women from over 100 US McDonald's outlets, have filed a USD 500 million class-action lawsuit, accusing the fast-food giant of fostering "systemic sexual harassment". According to the press, the two plaintiffs joined 5,000 other women who have worked at corporate-run McDonald's restaurants across Florida since April 2016 and experienced sexual harassment on the job. The suit alleged "extensive illegal harassment that went ignored by management". The plaintiffs also said that numerous women were subject to "pervasive sexual harassment and a hostile work environment, including groping, sexual assault and sexually-charged comments" at the Orlando restaurant.
On May 19th, 2020, press sources reported that an international group of labour unions has filed a complaint against McDonald's for alleged systematic sexual harassment at the Organisation for Economic Cooperation and Development (OECD)'s offices in the Netherlands. According to the general secretary of the International Union of Foodworkers, McDonald's workers have sounded the alarm about sexual harassment and gender-based violence for years, but the Company has allegedly failed to take meaningful action to address the problem.
On July 17, 2020, EEOC reported that Par Ventures, a North Carolina corporation which operates a chain of seven McDonald's fast food restaurants, will pay USD 12,500 and provide other relief to settle a sexual harassment lawsuit filed by the U.S. Equal Employment Opportunity Commission (EEOC).
On January 20, 2021, press sources reported that McDonald's workers have filed three new sexual harassment lawsuits. According to the press, workers at franchised McDonald's locations in St. Louis, Los Angeles, and Kansas City, Missouri, have filed lawsuits against the Company alleging sexual assault and harassment. One of the plaintiffs alleged that a manager attempted to pressure her into sexual acts in exchange for cash and a raise when she was a shift leader at a McDonald's in early 2019. The complaint said she began facing retaliation at work after rejecting his advances. The two other sexual-harassment lawsuits filed similarly alleged workers were not offered sufficient training or support in situations in which they described facing sexual harassment. In 2020, Florida McDonald's workers filed a USD 500 million sexual-harassment lawsuit against the Company. In 2019, Michigan McDonald's workers filed a complaint alleging fast-food giant failed to address a "systemic problem" of harassment. Over the past four years, McDonald's employees have filed more than 50 sexual-harassment complaints.
On March 8, 2021, press sources reported that a collective of current and former McDonald's employees has denounced a "systemic" policy of sexist discrimination within the fast-food chain in France. According to a letter to the Rights Defender on February 24, 2021, McDroits collective accused the Company of systemic discrimination practices, and alleged that it is not an isolated behaviour but the result of a harmful corporate culture. In its letter, McDroits has attached 164 direct testimonies of sexual harassment and sexist discrimination received in 2020. The Collective also alleged the issues of harassment and discrimination are long-standing and widespread" and these incidents "take place in the greatest silence of managers and in a constant disregard for the victims.

• Area: Discrimination

• Headline: Workers File Sexual Harassment Claims Against McDonald's

E(1).0

Serious

allegation No 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			[Reuters, 22/05/2019, "McDonald's faces 25 new sexual harassment complaints from workers": uk.reuters.com] [EEO, 22/11/2019, "McDonald's Franchisee Settles EEOC Sex Harassment Lawsuit": eeoc.gov] [MercoPress International, 16/04/2020, "Two McDonald's employees file US\$ 500 million class action lawsuit for systemic sexual harassment": en.mercopress.com] [Business Insider, 14/01/2021, "McDonald's slammed with 3 new sexual-harassment lawsuits as workers say the fast-food giant failed to protect them on the job": businessinsider.com]
E(1).1	The company has responded publicly to the allegation		The individual elements of the assessment are met or not as follows: Score 1 • Met: Public response: The company has issued several statements regarding allegations of sexual harassment since 2019. In general they state that sexual harassment has no place at the company and that it is essential that employees feel safe.
		1	CEO Chris Kempczinski has published a letter addressing the issue in 2021. It states that "Let me say plainly: every single person working under the Arches must have a safe and respectful work environment. Sexual harassment in the workplace is an affront to everything we stand for as a System. It has no place in any McDonald's restaurant, and it will not be tolerated. As CEO, I assure you that we take these allegations very seriously. We, as a System, must ensure that every allegation is fully and thoroughly investigated. If ever we find that we've fallen short of our values, we must acknowledge our mistakes and make them right. McDonald's isn't perfect, but we are steadfast in our efforts to improve our System each and every day. That's what it means to "get better together."" Kempczinki also said that in the statement that he takes those and other allegations "very seriously" and that the complaints will be "fully and thoroughly investigated," adding that "I want to recognize these individuals and acknowledge their courage." [Reuters, 22/05/2019: uk.reuters.com] [MercoPress International, 16/04/2020: en.mercopress.com] [Business Insider, 14/01/2021: businessinsider.com] [Chris Kempczinski Letter to Employees, 28/02/2021: corporate.mcdonalds.com] Score 2 Not Met: Detailed response: The individual statements on the cases raised remain vague, using general terminology and not addressing the individual alleged conduct.
			The letter by Chris Kempczinski also only addresses the issue in general, without going into detail on the facts of individual cases, such as some of the affected stakeholders being teenagers, or the varying degrees of sexual violence alleged by the workers. [Chris Kempczinski Letter to Employees, 28/02/2021: corporate.mcdonalds.com]
E(1).2	The company has investigated and taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Engaged with stakeholders: The company CEO said in the statement that he takes those and other allegations "very seriously" and that the complaints will be "fully and thoroughly investigated," adding that "I want to recognize these individuals and acknowledge their courage." However, there is no indication that the investigation will include engagement with affected stakeholders or that engagement would take place at all. [Chris Kempczinski Letter to Employees, 28/02/2021: corporate.mcdonalds.com] Not Met: Identified cause: The company CEO said in the statement that he takes those and other allegations "very seriously" and that the complaints will be "fully and thoroughly investigated," however, the company does not present investigative results on the underlying causes of the events concerned. Score 2 Met: Identified and implemented improvements: The company claims it has
			implemented a new complaints hotline since 2019 that allows employees to easily raise concerns. However, this does not address the fact that some affected stakeholders claim they were not made aware of the new hotline. Furthermore, the hotline was created before many of the new allegations took place and is therefore not an improvement implemented to address those allegations. However, according to the letter by Chris Kempczinski the company is designing a new set of Global Brand Standards to ensure that everyone understands a common set of McDonald's expectations for a safe and respectful workplace in both company-owned and franchised restaurants. [Business Insider, 26/10/2021, "3 new complaints from McDonald's workers accuse the company of a 'pattern of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			sexual harassment' and retaliation": businessinsider.com [Chris Kempczinski Letter to Employees, 28/02/2021: corporate.mcdonalds.com] • Met: Stakeholder input to steps taken: The CEO stated that the set of Global Brand Standards would be developed with input from franchisees and crew. [Chris Kempczinski Letter to Employees, 28/02/2021: corporate.mcdonalds.com]
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Provided remedy Not Met: Evidence for lack of Impact or link Score 2 Not Met: Remedy satisfactory to stakeholders Not Met: Remedy delivered Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		Area: Health & Safety Headline: COVID-19: McDonald's workers complained about working conditions amid coronavirus crisis
			• Story: On April 8, 2020, Reuters reported that U.S. companies that are laying off workers in response to the coronavirus pandemic but still paying dividends and buying back shares, are drawing criticism from labor unions, pension fund advisers, lawmakers and corporate governance experts. McDonald's was reportedly among companies that laid off staff, cut their hours, or slashed salaries while maintaining payouts to shareholders.
			On May 13th, 2020, press sources reported that McDonald's workers are complaining about working conditions amid coronavirus crisis. According to the press, McDonald's employees are facing multiple concerns amid the outbreak, including cut hours and layoffs around that time. Workers demand the company provide personal protective equipment, like masks, to help keep workers safe during the pandemic.
			In April 2020, workers at a McDonald's in Los Angeles walked out after they found out a fellow employee tested positive for coronavirus.
			On June 17th, 2020, press sources reported that workers at an Oakland McDonald's with a COVID-19 outbreak filed a public nuisance lawsuit against management for an alleged failure to create a safe work environment that prevents the spread of the virus.
			The plaintiffs alleged they were asked to report to work even when they were sick. The plaintiffs said they were also initially given doggie diapers and coffee filters to use as safety face masks for protection against the coronavirus. the attorney representing the workers claimed 25 cases of coronavirus were traced to the restaurant and infections were found in at least 11 workers and traced to several family members and seven workers at a nearby Berkeley location as managers at the Oakland restaurant and a nearby Berkeley franchise had a meeting and claims this likely led to the spread between the two locations.
			On August 12, 2021, press sources reported that an Oakland McDonald's restaurant will be required to follow new worker safety guidelines and establish a worker safety committee as part of a settlement with employees who were told to use coffee filters and dog diapers as face masks during a COVID-19 outbreak in 2020.
			According to the workers, who filed a public nuisance lawsuit in June 2020 over the outbreak, managers at the restaurant told cooks and cashiers to use coffee filters and dog diapers in lieu of actual face masks failed to enforce social distancing and checked workers' temperatures before their shift with an inaccurate thermometer.
			In a letter to the state's Division of Occupational Safety and Health, employee Yamile Osoy claimed that she and her 10-month-old son contracted COVID-19 after the franchise failed to implement proper protocols. The lawsuit alleged that at least 25 people were infected from an outbreak at the Oakland restaurant.
			As a result of the settlement, the McDonald's location will be required to follow various safety measures including offering employees paid sick leave, mandating

Indicator Code	Indicator name	Score (out of 2)	Explanation
			physical distancing, providing proper masks and gloves, regularly disinfecting shared surfaces, and conducting contact tracing when a case of the virus is confirmed in an employee.
			As part of the worker safety committee, the restaurant's owner and managers will be required to meet with workers each month to discuss ways to maintain worker safety. [The Sun, 13/05/2020, "LIFE OR DEATH McDonald's workers 'risking their lives for hamburgers' in COVID pandemic are ready to revolt": the-sun.com] [San Francisco Chronicle, 16/06/2020, "McDonald's workers in Oakland take further legal action against restaurant amid wave of COVID-19 cases": sfchronicle.com] [The Independent, 12/08/2021, "McDonald's franchise settles case of Covid masks made from 'dog diapers' and coffee filters given to staff": independent.co.uk] [NBC, 12/08/2021, "Settlement Requires Oakland McDonald's to Improve Worker Safety After COVID Outbreak": nbcbayarea.com]
E(2).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public response: In response to the allegation, the company stated: "Restaurant crew are the heart and soul of McDonald's and the health and safety of crew is McDonald's top priority". [The Sun, 13/05/2020: the-sun.com] Score 2 • Met: Detailed response: The company stated: "During these uncertain times, crew, like most people, have raised important questions regarding stopping the spread of COVID-19 and their safety. We understand their concern and continue to take decisive action as we learn more to build on our 65 years of high standards of cleanliness, hygiene and safety in our restaurants". [The Sun, 13/05/2020: the-sun.com]
E(2).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Engaged with stakeholders: Considering the press statement issued after the settlement, the company "will also provide a voice for its employees to ensure that they are heard. The Company will maintain a Safety Committee in which the owner and restaurant management will meet monthly with employee representatives to discuss the Company's efforts to maintain a safe work environment". [Altshuler Berzon LLP, 11/08/2021, "Workers at Oakland McDonald's Restaurant Reach Precedent-Setting Settlement - Press Statement": altshulerberzon.com • Not Met: Identified cause Score 2 • Met: Identified and implemented improvements: Since the company reopened the restaurant in question last summer, the company agreed to operate under COVID-19 safety precautions imposed by the Court. The company intends to abide by the COVID-19 requirements and recommendations of the CDC and all state and local health agencies for the next 12 months or until those requirements and recommendations are no longer in place. The settlement includes a provision that allows for individual safety precautions to be set aside if they are no longer required or recommended by any federal, state or local health agency. [Altshuler Berzon LLP, 11/08/2021: altshulerberzon.com]
E(2).3	The Company has taken appropriate action	2	 Met: Stakeholder input to steps taken: The settlement was formed between the company and the affected stakeholders. The individual elements of the assessment are met or not as follows: Score 1 Met: Provided remedy: The settlement is accepted as remedy. Not Met: Evidence for lack of Impact or link Score 2 Met: Remedy satisfactory to stakeholders: There is no evidence available suggesting the remedy is not considered satisfactory to the stakeholders. Met: Remedy delivered: There is no evidence available suggesting the company did not carry out the actions outlined in the settlement. Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information

purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

The CHRB is part of the World Benchmarking Alliance ('WBA'). The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of WBA, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with Dutch law and shall be subject to the exclusive jurisdiction of the Courts of Amsterdam.

As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

COPYRIGHT

Our publications and benchmarks are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution-Non Commercial-No Derivatives 4.0 International License. To view a copy of this license, visit creativecommons.org